

**REMARKS**

Claims 1, 3-8 and 10-14 have been examined and have been rejected under 35 U.S.C. § 103(a).

**I. Rejections under 35 U.S.C. § 103(a) in view of U.S. Patent No. 5,566,251 to Hanna et al. (“Hanna et al”) and U.S. Patent No. 5,479,205 to Silverbrook (“Silverbrook”)**

The Examiner has rejected claims 1, 3-8 and 10-14 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Hanna in view of Silverbrook.

**A. Claim 1**

Applicant submits that claim 1 is patentable over the cited references. For example, claim 1 recites that a computer unit is configured to compute position coordinates of the image information based on at least one of space coordinates of the camera, a zoom factor and a space vector. Further, the computer unit comprises a triggering unit configured to trigger at least one of the camera, the zoom device, and the device for three-dimensional orientation of the camera in accordance with at least one of the zoom factor and the space vector. The computer unit uses the zoom factor and the space vector directly for computing the position coordinates of the image information of a section of the environment.

In the current Office Action, the Examiner maintains that Hanna discloses all of the features of claim 1 except for a triggering unit and a display screen. However, as set forth in the November 14, 2005 Amendment, Hanna fails to teach that position coordinates of an image

information are based on at least one of space coordinates of a camera, a zoom factor and a space vector. Rather, Hanna merely discloses a pattern-key insertion technique that replaces a predetermined pattern present in a background scene with a substitute pattern present in a foreground scene (col. 4, lines 8-17). Thus, the computation of position coordinates in Hanna is performed by means of a pattern recognition type method. The aim of Hanna's invention is to merge two images, whereby a second pattern is geometrically transformed using a pose estimate of a detected first pattern. The dimension of the second pattern must be changed, specifically its pose, if the first pattern has been changed. On the other hand, in the current invention, the user information and the image information do not need to merge together. Rather, the user information can be changed according to the scale or zoom of the image.

In addition, the position coordinates of the present invention are directly determined on the basis of the zoom factor and the space vector provided by the computer unit itself. Thus, in contrast to the teachings of Hanna, the application of pattern recognition is not required to compute the position coordinates. Further, Applicant submits that the claimed invention requires less computation power and is significantly easier than the pattern recognition.

On page 2 of the Office Action, the Examiner refers to column 4, lines 40-50 of Hanna and maintains that Hanna does teach that position coordinates of image information are based on at least one of a space coordinate, a zoom factor and a space vector. However, as set forth in the cited portion, the logo "A" is being replace with logo "B" using orientation, scale and perspective patterns of the logo "A" in successive 2-dimensional video image frames. Such

pattern-key insertion technique of Hanna, and particularly the use of “2D” images, does not disclose the use of *space coordinates* of a camera, a zoom factor and a space vector.

In regard to the claimed triggering unit, the Examiner refers to the camcorder system of Silverbrook. The Examiner maintains that one skilled in the art would have been motivated to substitute the camera of Hanna with the camcorder system of Silverbrook, so that orientation and scaling of the camera within the combined invention is able to be user controlled (pg. 5 of Office Action). However, as set forth above, Hanna is directed to merging two images using a pattern key insertion technique. Therefore, Applicant submits that even if the camera of Hanna were replaced with the camera of Silverbrook, the alleged combination would still fail to disclose the claimed invention. Further, Applicant submits that one skilled in the art would not look to the teachings of Hanna (i.e., a pattern key insertion technique) in order to insert user information in a location on a display area according to a position of an image, in the manner recited in claim 1.

In view of the above, Applicant respectfully requests the Examiner to reconsider and withdraw the rejection of claim 1.

**B. Claim 8**

Claim 8 recites a method where position coordinates of image information are computed based on at least one of space coordinates of a camera, a zoom factor and a space vector. By using a triggering unit, the computer unit triggers at least one of the camera, the zoom device, and the device for three-dimensional orientation of the camera in accordance with at least one of the zoom factor and the space vector. Further, the computer unit uses the zoom factor and the

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space vector directly for computing the position coordinates of the image information of the section of the environment. Accordingly, Applicant submits that claim 8 is patentable for at least analogous reasons as claim 1 set forth above.

**C. Claims 3-7 and 10-14**

Since claims 3-7 and 10-14 are dependent upon one of claims 1 or 8, Applicant submits that such claims are patentable at least by virtue of their dependency.

**II. Conclusion**

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

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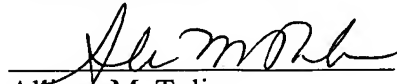
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